

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JASON DEAN GEILS,
Plaintiff,

v.

DON PATIN,
Defendant.

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CIVIL ACTION NO. 3:11-cv-00650

PLAINTIFF'S RULE 26(a)(3)(A) PRE-TRIAL DISCLOSURES

To: Defendant Don Patin, by and through his attorney of record, Lance Wyatt,
141 Countryside Court, Suite 150 Southlake, Texas 76092.

Plaintiff Jason Dean Geils hereby submits to Defendant his Pre-trial

Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3)(A).

DISCLOSURE 26(a)(3)(A): (i) The name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises; (ii) the designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition; and (iii) an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items it may offer if the need arises.

I. Plaintiff expects to call as witnesses at trial:

1. Jason Dean Geils, Plaintiff c/o
Scott H. Palmer, P.C.
15455 Dallas Parkway, Suite 540
Addison, Texas 75001
Telephone: 214.987.4100
2. Don Patin, Defendant c/o
Law Office of Lance F. Wyatt, PLLC
141 Countryside Court, Suite 150
Southlake, Texas 76092
(817) 251-9220 (Office)

3. Mac Tristan
Chief of Police, City of Coppell Police Dept.
130 Town Center Blvd.
Coppell, Texas 75019
972-304-3610
4. Matthew Kosec
Deputy Chief, City of Coppell Police Dept.
130 Town Center Blvd.
Coppell, Texas 75019
972-304-3610
5. Robin G. Chavez
Carrollton Police Department
2025 East Jackson Road
Carrollton, Texas 75006
972.466.3333
6. Gary Anderson
Carrollton Police Department
2025 East Jackson Road
Carrollton, Texas 75006
972.466.3333

DISCLOSURE 26(a)(3)(A)(ii): The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition.

I. Plaintiff may introduce testimony from depositions by written questions served by Defendant upon:

7. Nancy Reagan, Custodian of Records for Centennial Medical Center.
8. Saranny Granger, Custodian of Records for Hebron ER Physicians.
9. Fabiola Hadley, Custodian of Records for Medical Center of Lewisville.
10. Alicia Castellano, Custodian of Records for Medical Imaging of Dallas.
11. Maureen DuSold, Custodian of Records for City of Lewisville.

12. Kathryn Boone Helton, Custodian of Records for Dr. Brian Lee Joe, M.D.
13. Lisa Turner, Custodian of Records for Olympus Family Medicine/Dr. Scott Neumann, D.O.
14. Iann Gassman, Custodian of Records for Baylor Medical Center at Carrollton.

DISCLOSURE 26(a)(A)(iii): an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items it may offer if the need arises.

I. Plaintiff expects to introduce the following documents and exhibits:

15. Affidavit for Authentication of Medical Records from the Custodian of Records of Baylor Medical Center at Carrollton and accompanying medical records.
16. Affidavit of Authentication of Medical Expenses from the Custodian of Records of Baylor Medical Center at Carrollton and accompanying medical expenses.
17. Affidavit for Authentication of Medical Records from the Custodian of Records of the Medical Center of Lewisville and accompanying medical records.
18. Affidavit for Authentication of Medical Expenses from the Custodian of Records of Medical Center of Lewisville and accompanying medical expenses.
19. Affidavit for Authentication of Medical Records from the Custodian of Records of Dr. Brian Joe and the accompanying medical records.
20. Affidavit for Authentication of Medical Expenses from the Custodian of Records of Dr. Brian Joe and the accompanying medical expenses.
21. Affidavit for Authentication of Business Records from the City of Carrollton Custodian of Records and the accompanying Internal Affairs investigation file.
22. Video – jail intake video depicting the incident that made the basis of this lawsuit.

II. Plaintiff may call the following witnesses:

- 23. Custodian of records of Baylor Medical Center at Carrollton.
- 24. Custodian of records of Medical Center of Lewisville.
- 25. Custodian of records of Dr. Brian Joe.
- 26. Custodian of records of City of Carrollton.

Respectfully submitted,

/s/ J.R. Fletcher
J.R. Fletcher
State Bar No. 24038304
Scott H. Palmer
State Bar No. 00797196

SCOTT H. PALMER, P.C.
15455 Dallas Parkway, Suite 540
Addison, Texas 75001
(214) 987-4100 (*telephone*)
(214) 922-9900 (*telecopier*)

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record via electronic case filing on June 11, 2012.

/s/ J.R. Fletcher
J.R. Fletcher